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A. CISNEROS

7
8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

10 In re

11 SHAMICKA LAWRENCE,

12 Debtor.

Case No. 6:23-bk-15163-WJ

Chapter 7

**SECOND STIPULATION FOR
EXTENSION OF DEADLINE TO
OBJECT TO DISCHARGE**

[NO HEARING REQUIRED]

14
15 TO THE HONORABLE WAYNE E. JOHNSON, UNITED STATES BANKRUPTCY JUDGE,
16 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

17 This stipulation (“Stipulation”) is entered into between Arturo M. Cisneros, in his capacity as
18 Chapter 7 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Shamicka Lawrence
19 (“Debtor”), Debtor, and the United States Trustee for the Central District of California, Region 16
20 (“U.S. Trustee” and collectively, the “Parties”), with regard to the following:

21 **Recitals**

22 A. On November 3, 2023 (“Petition Date”), Debtor filed a voluntary petition under
23 Chapter 7 of Title 11 of the United States Code, initiating the above-captioned bankruptcy case.
24 Arturo M. Cisneros (previously defined as “Trustee”) was appointed as the Chapter 7 Trustee.

25 B. Debtor’s schedules disclosed an interest in real property commonly known as 11364
26 Estates Court, Riverside, CA 92503 (“Property”), with a scheduled value of \$1,200,000. Debtor also
27 scheduled a homestead exemption in the Property.

28 C. The Debtor’s schedules also disclose an ownership interest in various entities.

1 D. On December 6, 2023, the Trustee conducted the initial meeting of creditors. The
2 meeting of creditors has been continued and is currently set for March 20, 2024.

3 E. The current, stipulated extended deadline to object to discharge is April 5, 2024
4 ("Discharge Deadline").

5 F. Trustee is proceeding, with the initial consent of the co-owners of the Property, to
6 prepare to market the Property. Trustee and Debtor are considering a stipulation for turnover to
7 facilitate Trustee's marketing of the Property and, if necessary, the sale of the Property.

8 The Parties agree and STIPULATE as follows:

9 1. The deadline for Trustee and the U.S. Trustee to file an objection to discharge shall
10 be further extended through and including June 5, 2024 ("Extended Deadline"). The Extended
11 Deadline shall be applicable only to the Trustee and U.S. Trustee and no other party in interest.

12 2. The Stipulation is without prejudice to any further extensions of the deadline to object
13 to discharge, to be made by further motion or stipulation.

14 3. This Stipulation may be executed in one or more counterparts and facsimile or
15 electronic signatures may be used in filing this document with the Court.

16 Dated: March 29, 2024

MARSHACK HAYS WOOD LLP

17 By: /s/ Tinho Mang
18 D. EDWARD HAYS
19 TINHO MANG
20 Attorneys for Chapter 7 Trustee
A. CISNEROS

21 Dated: March 29, 2024

UNITED STATES TRUSTEE FOR THE
CENTRAL DISTRICT OF CALIFORNIA,
REGION 16

22 By: [Signature]
23 Everett L. Green
24 Trial Attorney
25 SHAMICKA LAWRENCE

26 Dated: March , 2024

27 By: [Signature]
28 DEBTOR

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **SECOND STIPULATION FOR EXTENSION OF DEADLINE TO OBJECT TO DISCHARGE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **March 29, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **CHAPTER 7 TRUSTEE ARTURO CISNEROS (TR):** Arturo Cisneros (TR) amctrustee@mclaw.org, acisneros@iq7technology.com; ecf.alert+Cisneros@titlexi.com
- **INTERESTED PARTY:** Alan W Forsley alan.forsley@flpllp.com, awf@fklawfirm.com, awf@fl-lawyers.net, addy@flpllp.com
- **INTERESTED PARTY:** Thomas M Geher tmg@jmbm.com, bt@jmbm.com; tmg@ecf.courtdrive.com
- **INTERESTED PARTY MESSAGE ENVY FRANCHISING, LLC:** Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEYS FOR TRUSTEE:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.co
- **ATTORNEY FOR DEBTOR SHAMICKA LAWRENCE:** Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com, addy@flpllp.com
- **ATTORNEYS FOR TRUSTEE:** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **US TRUSTEE:** United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **March 29, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

SHAMICKA LAWRENCE
11364 ESTATES COURT
RIVERSIDE, CA 92503

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **March 29, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

HONORABLE WAYNE E. JOHNSON – VIA OVERNIGHT MAIL

PRESIDING JUDGE'S COPY

United States Bankruptcy Court, Central District of California
3420 Twelfth Street, Suite 384 / Courtroom 304
Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 29, 2024

Chanel Mendoza

/s/ Chanel Mendoza

Date

Printed Name

Signature